1 THE HONORABLE JOHN H. CHUN 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 NORTHWEST ADMINISTRATORS, INC., Case No. 2:23-cv-01430-JHC 10 Plaintiff, STIPULATION AND ORDER 11 **EXTENDING DEFENDANT'S** v. **DEADLINE TO ANSWER OR** 12 RESPOND TO COMPLAINT DHL EXPRESS (USA), INC., an Ohio 13 corporation, NOTE ON MOTION CALENDAR: October 10, 2023 14 Defendant. 15 16 **STIPULATION** 17 Defendant DHL Express (USA), Inc. and Plaintiff Northwest Administrators, Inc. hereby 18 STIPULATE AND AGREE to extend the deadline for Defendant to answer or otherwise respond 19 to the Complaint to November 1, 2023. 20 On September 20, 2023, Plaintiff served the Complaint on Defendant. Under FRCP 21 12(a)(1), Defendant's answer or other response is currently due on October 11, 2023. Counsel for 22 Plaintiff and Defendant have conferred. In light of the investigation Defendant must undertake to 23 fully assess Plaintiff's complaint, there is good cause to grant the parties' stipulated request for 24 additional time so that the parties and the Court have ample time to address and consider all such 25 issues. Accordingly, Plaintiff and Defendant stipulate and agree, subject to the Court's approval, 26

STIPULATION AND ORDER EXTENDING DEFENDANT'S DEADLINE TO ANSWER OR RESPOND TO COMPLAINT - 1 (Case No. 2:23-cv-01430-JHC)

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to extend the Defendant's deadline to answer or otherwise respond to November 1, 2023. 1 2 This stipulation and order shall not operate as an admission of any factual allegation or legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim or objection, 3 including lack of jurisdiction and the right to seek arbitration of Plaintiff's claims. 4 5 IT IS SO STIPULATED. 6 7 Dated this 10th day of October, 2023. 8 MORGAN, LEWIS & BOCKIUS LLP 9 10 By: *s/ Amy P. Taylor* Amy P. Taylor, WSBA #53644 11 1301 Second Avenue, Suite 2800 Seattle, WA 98101 12 Phone: (206) 274-6400 13 Email: amy.taylor@morganlewis.com 14 Melissa D. Hill (pro hac vice to be submitted) 101 Park Avenue 15 New York, NY 10178-0060 Phone: (212) 309-6318 16 Email: melissa.hill@morganlewis.com 17 Attorneys for Defendant 18 19 20 21 22 23 24 25 26

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1 **ORDER** 2 IT IS SO ORDERED. 3 DATED: October 11, 2023. John M. Chan 4 5 THE HONORABLE JOHN H. CHUN 6 UNITED STATES DISTRICT JUDGE 7 8 Presented by: MORGAN, LEWIS & BOCKIUS LLP 9 10 By: *s/ Amy P. Taylor* Amy P. Taylor, WSBA # 53644 11 1301 Second Avenue, Suite 2800 Seattle, WA 98101 12 Phone: (206) 274-6400 Email: amy.taylor@morganlewis.com 13 Melissa D. Hill (pro hac vice to be submitted) 14 101 Park Avenue New York, NY 10178-0060 15 Phone: (212) 309-6318 16 Email: melissa.hill@morganlewis.com 17 Attorneys for Defendant 18 REID, MCCARTHY, BALLEW & LEAHY, LLP 19 By: s/Russell J. Reid 20 Russell J. Reid, WSBA # 2560 100 West Harrison Street, N. Tower, #300 21 Seattle, WA 98119 Phone: (206) 285-0464 22 Email: rjr@rmbllaw.com 23 Attorney for Plaintiff 24 25 26

STIPULATION AND ORDER EXTENDING DEFENDANT'S DEADLINE TO ANSWER OR RESPOND TO COMPLAINT - 3 (Case No. 2:23-cv-01430-JHC)

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